

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index No.:

-----X
JANET ANNOR,

Date Purchased:

Plaintiff(s),

SUMMONS

-against-

Plaintiff designates Bronx
County as the place of trial.

HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT,

The basis of venue is:

Defendant(s).

Incident location

-----X

Incident occurred at:

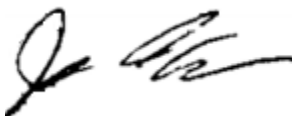
2560 Bruckner Boulevard
Bronx, NY 10465

To the above-named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiffs' attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: NEW YORK, NEW YORK

August 26, 2022



JAMES HODNETT
ADAM D. POLO, ESQ., P.C.
Attorneys for Plaintiff
8 W 38th Street, Suite 803
New York, New York 10018
(212) 221-6221
File No. 2100035

TO: HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT
Via Secretary of State
2560 Bruckner Blvd
Bronx, NY 10465

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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JANET ANNOR,

Plaintiff(s),

-against-

HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT,

Defendant(s).
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Index No.:
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**VERIFIED
COMPLAINT**

Plaintiff, **JANET ANNOR**, by her attorneys, complaining of the Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, respectfully alleges, upon information and belief:

1. That at the time of the commencement of this action, Plaintiff, **JANET ANNOR**, resided in the County of Bronx, City and State of New York.
2. That the cause of action alleged herein arose in the County of Bronx, City and State of New York.
3. That this action falls within one or more of the exemptions set forth in CPLR §1602.
4. That at all times herein mentioned, the Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, was and still is a domestic corporation, duly organized and existing under and by virtue of the laws of the State of New York.
5. That at all times herein mentioned, the Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, was and still is a foreign corporation duly authorized to do business in the State of New York.
6. That at the time of the commencement of this action, Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, was operating a business in the County of Bronx and State of New York.
7. That at the time of the commencement of this action, Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, maintained a principal place of business at 2560 Bruckner Blvd,

Bronx, NY 10465, in the County of Bronx, City and State of New York.

AS FOR THE FIRST CAUSE OF ACTION

8. That on or before March 4, 2021, and at all times herein mentioned, Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, owned the premises located at Home Depot located at 2560 Bruckner Blvd, Bronx, NY 10465, in the County of Bronx, City and State of New York.
9. That on or before March 4, 2021, and at all times herein mentioned, Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, was the lessor of the premises located at Home Depot located at 2560 Bruckner Blvd, Bronx, NY 10465, in the County of Bronx, City and State of New York.
10. That on or before March 4, 2021, and upon information and belief, Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, maintained the aforesaid premises and appurtenances and fixtures thereto.
11. That on or before March 4, 2021, and at all times herein mentioned, the aforesaid premises and appurtenances and fixtures thereto were controlled by Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**.
12. That on or before March 4, 2021, and at all times herein mentioned, the aforesaid premises and appurtenances and fixtures thereto were operated by Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**.
13. That on or before March 4, 2021, and at all times herein mentioned, the aforesaid premises and appurtenances and fixtures thereto were managed by Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**.
14. That on or before March 4, 2021, and at all times hereinafter mentioned, the Defendant,

HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT, supervised the aforesaid premises and appurtenances and fixtures thereto.

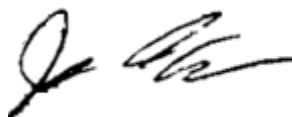
15. On March 4, 2021, “JOHN DOE”, was an employee and/or agent of defendant, Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**.
16. On March 4, 2021, “JOHN DOE”, was working in the scope of his employment at the premises located at 2560 Bruckner Boulevard, Bronx, New York.
17. On March 4, 2021, “JOHN DOE, negligently caused the plaintiff to become injured at 2560 Bruckner Boulevard, Bronx, New York.
18. The Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, was negligent in supervising, hiring and/or training their employee, “JOHN DOE”.
19. That on March 4, 2021, Plaintiff, **JANET ANNOR**, was lawfully at the aforesaid premises.
20. That on March 4, 2021, while Plaintiff, **JANET ANNOR**, was lawfully at the aforesaid location, Plaintiff was caused to sustain severe and permanent injuries due to the negligence of their employee in the movement of a boxed cabinet.
21. That the above-mentioned occurrence, and the results thereof, were caused by the negligence of the Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, and/or said Defendants’ agents, servants, employees and/or licensees in the ownership, operation, management, maintenance, repair and control of the aforesaid premises.
22. That Defendant, **HOME DEPOT U.S.A., INC. d/b/a HOME DEPOT**, jointly and/or severally and through its agents, servants, and or employees, were careless, negligent, in their ownership, operation, control, care, custody, charge, supervision, management, and maintenance of the aforesaid premises, appurtenances and fixtures thereto; in causing, creating, permitting, and or allowing a dangerous, hazardous, defective, and unsafe condition upon said

premises; in failing to undertake proper and/or adequate safety studies and/or surveys; in failing to hire efficient and/or sufficient personnel; in failing to provide plaintiff with reasonably safe condition on subject premises; in failing to properly operate the aforementioned premises; in causing plaintiff to be injured while she was lawfully at the subject premises; in failing to avoid the aforesaid accident which was foreseeable; and the defendant was otherwise reckless, careless and negligent.

23. That no negligence on the part of the Plaintiff, **JANET ANNOR**, contributed to the occurrence alleged herein in any manner whatsoever.
24. That as a result of the foregoing, Plaintiff, **JANET ANNOR**, was caused to sustain serious injuries and to have suffered pain, shock and mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.
25. That by reason of the foregoing, Plaintiff, **JANET ANNOR**, was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, the Plaintiff demands judgment on all causes of action against the defendants in a substantial amount to be determined by the Supreme Court of the State of New York which amount exceeds the jurisdictional limits of all lower courts which might otherwise have jurisdiction thereof.

Dated: NEW YORK, NEW YORK
August 26, 2022



James Hodnett, Esq.
ADAM POLO, ESQ.

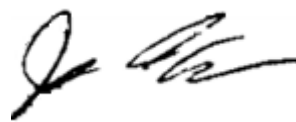
Attorneys for Plaintiff
Janet Annor
8 W 38th Street, Suite 803
New York, New York 10018
(212) 221-6221

Attorney's Verification

James Hodnett, an attorney duly admitted to practice law in the State of New York and associated with Adam D. Polo, Esq., P.C., attorneys for Plaintiff herein, and that I have read the foregoing Summons and Verified Complaint and that the contents thereof; is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters, deponent believes them to be true.

The source of deponent's knowledge is based upon a review of the litigation file maintained in the office. This verification is made by deponent rather than by the plaintiff in that the plaintiff is not now within New York County, in which county deponent regularly maintains an office.

Dated: New York, New York
August 26, 2022



James Hodnett, Esq.

Adam D. Polo, Esq., P.C.

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HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT,

Defendant(s).

SUMMONS AND COMPLAINT

Adam D. Polo, Esq., P.C.
Attorneys for Plaintiff
8 W 38th Street, Suite 803
New York, New York 10018
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TO: ALL PARTIES